



August 15th, 2005

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National Organic Program
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Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. Pacific Organic Produce **supports the National List as published and would like to especially support the continued allowance of the following substances:**

Name of Substance	Location on National List
Chlorine materials, Calcium hypochlorite	205.601 (a) (2) (i)
Chlorine materials, Chlorine dioxide	205.601 (a) (2) (ii)
Chlorine materials; Sodium hypochlorite	205.601 (a) (2) (iii)
Hydrogen peroxide	205.601 (a) (4), 205.601 (i) (4), 205.605 (b)
Herbicides, soap-based	205.601 (b) (1)
Mulches; Newspaper or other recycled paper-- without glossy or colored inks.	205.601 (b) (2) (i)
Mulches; Plastic mulch and covers (petroleum-based other than polyvinyl chloride (PVC)).	205.601 (b) (2) (ii)
As animal repellents--Soaps, ammonium--for use as a large animal repellant only, no contact with soil or edible portion of crop.	205.601 (d)
Ammonium carbonate	205.601 (e) (1)
Boric acid	205.601 (e) (2)
Elemental Sulfur	205.601 (e) (4), 205.601 (i) (9), 205.601 (j) (2)
Lime sulfur	205.601 (e) (5), 205.601 (i) (5)
Oils, horticultural	205.601 (e) (6)
Soaps, insecticidal	205.601 (e) (7)
Sticky traps/barriers	205.601 (e) (8)
As insect management. Pheromones	205.601 (f)

Sulfur dioxide	205.601 (g) (1)
Vitamin D3	205.601 (g) (2)
Coppers, fixed	205.601 (i) (1)
Copper sulfate	205.601 (i) (2)
Hydrated lime	205.601 (i) (3)
Oils, horticultural, narrow range oils as dormant, suffocating, and summer oils	205.601 (i) (6)
Potassium bicarbonate	205.601 (i) (8)
Streptomycin, for fire blight control in apples and pears only	205.601 (i) (10)
Tetracycline (oxytetracycline calcium complex), for fire blight control only	205.601 (i) (11)
Humic acids	205.601 (j) (3)
Lignin sulfonate	205.601 (j) (4)
Magnesium sulfate	205.601 (j) (5)
Micronutrients	205.601 (j) (6)
Soluble boron products	205.601 (j) (6) (i)
Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt	205.601 (j) (6) (ii)
Liquid fish products	205.601 (j) (7)
Vitamins, B1, C, and E	205.601 (j) (8)
As plant growth regulators. Ethylene gas--for regulation of pineapple flowering	205.601 (k)
Acids (Alginic; Citric--produced by microbial fermentation of carbohydrate substances; and Lactic)	205.605 (a)
Agar-agar	205.605 (a)
Calcium carbonate	205.605 (a)
Calcium chloride	205.605 (a)
Colors--nonsynthetic sources only	205.605 (a)
Diatomaceous earth--food filtering aid only	205.605 (a)
Enzymes--must be derived from edible, nontoxic plants, nonpathogenic fungi, or nonpathogenic bacteria	205.605 (a)
Flavors--nonsynthetic sources only and must not be produced using synthetic solvents and carrier systems or any artificial preservative	205.605 (a)
Kaolin	205.605 (a)
Magnesium sulfate, nonsynthetic sources only	205.605 (a)
Nitrogen--oil-free grades	205.605 (a)
Oxygen--oil-free grades	205.605 (a)
Sodium bicarbonate	205.605 (a)
Sodium carbonate	205.605 (a)
Waxes--nonsynthetic (Carnauba wax; and Wood resin)	205.605 (a)
Yeast--nonsynthetic, growth on petrochemical substrate and sulfite waste liquor is prohibited	205.605 (a)

(Autolysate; Bakers; Brewers; Nutritional; and Smoked--nonsynthetic smoke flavoring process must be documented)	
Ascorbic acid	205.605 (b)
Calcium hydroxide*	205.605 (b)
Carbon dioxide	205.605 (b)
Chlorine materials--disinfecting and sanitizing food contact surfaces, Except, That, residual chlorine levels in the water shall not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act (Calcium hypochlorite; Chlorine dioxide; and Sodium hypochlorite)	205.605 (b)
Ethylene--allowed for postharvest ripening of tropical fruit and degreening of citrus	205.605 (b)
Ozone	205.605 (b)
Phosphoric acid--cleaning of food-contact surfaces and equipment only	205.605 (b)
Potassium carbonate	205.605 (b)
Cornstarch (native)	205.606 (a)
Kelp--for use only as a thickener and dietary supplement	205.606 (c)

*Calcium Hydroxide is additionally supported by:

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 CEO, Wholesome Sweeteners, Inc.
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 Sugar Land, TX 77479
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Removal of the above mentioned substances would be detrimental as there are currently no commercially available organic alternatives to the above substances. Until such time, we strongly suggest that the National List remain as it is today.

Sincerely,



Amy Rosenoff
 Pacific Organic Produce

Cc: Organic Trade Association
 National Organic Standards Board